

CR 19 - 257 MJD/KMM

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2
)	18 U.S.C. § 922(g)(1)
v.)	18 U.S.C. § 922(g)(3)
)	18 U.S.C. § 924(d)(1)
(1) AMANDA MARIE LETOURNEAU,)	21 U.S.C. § 841(a)(1)
)	21 U.S.C. § 841(b)(1)(A)
(2) MICHAEL ALLEN VOELZ,)	21 U.S.C. § 853
)	28 U.S.C. § 2461(c)
Defendants.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Possession with Intent To Distribute a Controlled Substance)

On or about August 28, 2019, in the State and District of Minnesota, the defendants,

**AMANDA MARIE LETOURNEAU, and
MICHAEL ALLEN VOELZ,**

each aiding and abetting the other, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

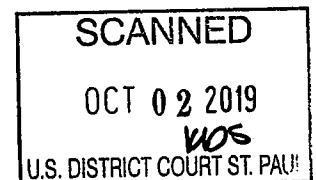
COUNT 2

(Felon in Possession of a Firearm)

On or about August 28, 2019, in the State and District of Minnesota, the defendant,

AMANDA MARIE LETOURNEAU,

having previously been convicted of the following crimes, each of which was punishable



U.S. v. Amanda Marie Letourneau et al.

by a term of imprisonment exceeding one year:

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
2nd Degree Drug Sale	Lyon County, MN	June 2013
5th Degree Drug Possession	Pipestone County, MN	October 2013
1st Degree Burglary	Lyon County, MN	June 2014

and knowing she had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, namely the following:

Description	Serial Number
Remington Model 700 ML rifle	ML098995
Winchester Model 37A 410 gauge shotgun	C6A4253
Charles Daly 600 12 gauge shotgun	3507482
Browning Auto 5 12 gauge shotgun	06702PX151
Savage Model 11 .243 caliber rifle	H632846
Mossberg 500c 20 gauge shotgun	K760629
Optima Pro 50 caliber rifle	61-13-095067-07
Charles Daly 600 12 gauge shotgun	110538
Mossberg 500c 20 gauge shotgun	R975959
Browning A5 12 gauge shotgun	1M39256
Winchester Model 70 rifle	62515676
Remington 870 Express 12 gauge shotgun	D767043A
Taurus Judge revolver	FN561181
Super Comanche 45 LC/410 handgun	161204
Unbranded AR-15-style rifle	No visible serial number

U.S. v. Amanda Marie Letourneau et al.

Taurus PT24/7G2 handgun	SE242587
Ruger SR22 .22 caliber handgun	363-02665
Springfield XD9 handgun	GM838409
Remington Model 511 .22 caliber rifle	Unknown serial number
Ruger 10-22 .22 caliber rifle	230-06154

all in violation of Title 18, United States Code, Sections 2 and 922(g)(1).

COUNT 3

(Unlawful User of a Controlled Substance in Possession of a Firearm)

On or about August 28, 2019, in the State and District of Minnesota, the defendant,

MICHAEL ALLEN VOELZ,

then being an unlawful user of methamphetamine, a controlled substance as defined in 21 U.S.C. § 802, and knowing he was an unlawful user of methamphetamine, did knowingly possess, in and affecting interstate commerce, firearms, namely the following:

Description	Serial Number
Remington Model 700 ML rifle	ML098995
Winchester Model 37A 410 gauge shotgun	C6A4253
Charles Daly 600 12 gauge shotgun	3507482
Browning Auto 5 12 gauge shotgun	06702PX151
Savage Model 11 .243 caliber rifle	H632846
Mossberg 500c 20 gauge shotgun	K760629
Optima Pro 50 caliber rifle	61-13-095067-07
Charles Daly 600 12 gauge shotgun	110538

U.S. v. Amanda Marie Letourneau et al.

Mossberg 500c 20 gauge shotgun	R975959
Browning A5 12 gauge shotgun	1M39256
Winchester Model 70 rifle	62515676
Remington 870 Express 12 gauge shotgun	D767043A
Taurus Judge revolver	FN561181
Super Comanche 45 LC/410 handgun	161204
Unbranded AR-15-style rifle	No visible serial number
Taurus PT24/7G2 handgun	SE242587
Ruger SR22 .22 caliber handgun	363-02665
Springfield XD9 handgun	GM838409
Remington Model 511 .22 caliber rifle	Unknown serial number
Ruger 10-22 .22 caliber rifle	230-06154

all in violation of Title 18, United States Code, Sections 2 and 922(g)(3).

FORFEITURE ALLEGATIONS

Counts 1 through 3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853(a), in conjunction with Title 28, United States Code, Section 2461(c).

If convicted of Count 1 of this Indictment, the defendants

**AMANDA MARIE LETOURNEAU, and
MICHAEL ALLEN VOELZ,**

U.S. v. Amanda Marie Letourneau et al.

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

If convicted of any Count of this Indictment, the defendants

**AMANDA MARIE LETOURNEAU, and
MICHAEL ALLEN VOELZ,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) in conjunction with Title 28, United States Code, Section 2461(c), any firearm with accessories or ammunition involved in or used in any knowing or willful violation of Sections 922(g)(1) or 922(g)(3), including, but not limited to the following:

Description	Serial Number
Remington Model 700 ML rifle	ML098995
Winchester Model 37A 410 gauge shotgun	C6A4253
Charles Daly 600 12 gauge shotgun	3507482
Browning Auto 5 12 gauge shotgun	06702PX151
Savage Model 11 .243 caliber rifle	H632846

U.S. v. Amanda Marie Letourneau et al.

Mossberg 500c 20 gauge shotgun	K760629
Optima Pro 50 caliber rifle	61-13-095067-07
Charles Daly 600 12 gauge shotgun	110538
Mossberg 500c 20 gauge shotgun	R975959
Browning A5 12 gauge shotgun	1M39256
Winchester Model 70 rifle	62515676
Remington 870 Express 12 gauge shotgun	D767043A
Taurus Judge revolver	FN561181
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Taurus PT24/7G2 handgun	SE242587
Ruger SR22 .22 caliber handgun	363-02665
Springfield XD9 handgun	GM838409
Remington Model 511 .22 caliber rifle	Unknown serial number
Ruger 10-22 .22 caliber rifle	230-06154

along with all ammunition and accessories seized therewith.

All in violation of Title 18, United States Code, Sections 922(g)(1), 922(a)(6), 924(a)(2), in conjunction with Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

U.S. v. Amanda Marie Letourneau et al.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON